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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

IN RE META PIXEL TAX FILING CASES

Master File No. 5:22-cv-07557-PCP

This document relates to:

**STIPULATION AND ~~[PROPOSED]~~  
ORDER TO MODIFY CLASS  
CERTIFICATION BRIEFING  
DEADLINES**

All actions

**[L.R. 6-2]**

The parties jointly ask the Court for a four-week extension of the deadline for Plaintiffs' motion for class certification, from July 21, 2025 to August 18, 2025. The parties make this request because the deposition of Meta's 30(b)(6) witness had been scheduled for June 13, 2025, which would have occurred sufficiently in advance of the class certification deadline. However, on June 6, 2025, counsel for Meta represented that the prepared deponent was no longer available on June 13, 2025, due to a bereavement requiring travel out of the country for an indefinite period, and that Meta's most suitable alternative 30(b)(6) deponent was out of the country the week of June 9th, returning June 16, 2025. Counsel have met and conferred and have agreed to reschedule the 30(b)(6) deposition for July 14, 2025, the soonest available alternative date for Meta's alternative witness.

To avoid prejudice to Plaintiffs from the change in dates, the parties have agreed, subject to approval by the Court, to alter the class certification deadlines as follows:

Event	Current Deadline	Proposed New Deadline
Plaintiffs' Motion for Class Certification	July 21, 2025	August 18, 2025
Meta's Opposition to Class Certification	September 29, 2025	October 27, 2025
Plaintiffs' Reply Brief	November 17, 2025	December 15, 2025

There was one prior request to alter the class certification, which the Court granted. *See* ECF No. 156. There is compelling good cause for this request because, as Meta represents, it is the result of unforeseen, extenuating circumstances, which arose through no fault of either party, and the parties have promptly sought relief from the Court. In addition, the requested extension is brief, and corresponds to the amount of time lost due to the deposition scheduling issue (i.e., approximately four weeks).

The Court has not set any deadlines other than for class certification briefing, and so granting this request will have no other effect on the schedule for the case. Accordingly, the parties jointly ask the Court to modify the current deadlines according to the new dates set forth above.

1 Dated: June 20, 2025

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Dated: June 20, 2025

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**CIVIL L.R. 5-1(i)(3) ATTESTATION**

Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest under penalty of perjury that concurrence in the filing of this document has been obtained from all signatories.

Dated: June 20, 2025

By: /s/ Joel Smith

**~~[PROPOSED]~~ ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: June 23, 2025



Hon. P. Casey Pitts  
U.S. District Judge